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August 15, 2024

Hon. J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Rafael Alvarez
24 Cr. 221 (JPO)

Your Honor:

Along with Michael K. Bachrach, Esq. I represent Rafael Alvarez in the above-captioned matter and write today for a modification of the defendant's bond so as to allow travel to various locations in the upcoming weeks and in November 2024.

Defendant Alvarez' current bail conditions include a \$600,000.00 appearance bond co-signed by four financially responsible individuals and secured by real property located in Cortland Manor, New York. His travel is restricted to the Southern and Eastern Districts of New York. He is also required to seek and maintain employment. To that end, Mr. Alvarez wishes to attend certain franchise expositions. As a franchise consultant he would be a featured speaker and maintain a booth to sell his services to attendees. Pretrial Officer Andrew Abbott consents to the defendant accompanying his daughter to Pittsburgh University on August 19, 20 as well as attending the proposed expos provided that Mr. Alvarez provide Pretrial Services with his travel itinerary, and confirmation/receipts for his activities such as booking a sales booth, trade show schedules if he were to be a speaker and full travel accommodations and details.

Specifically we are respectfully requesting modification of his travel restrictions so as to allow travel on the following dates:

1) August 19, 20, 2024: To accompany defendant's daughter to Pittsburgh University located in Pittsburgh, PA as she starts her college year;

2) August 23, 24, 2024: Expo Franquicias Caribe, Caguas, Puerto Rico;


3) September 6, 7, 2024: Franchise Expo South, Fort Lauderdale, Florida;

4) November 14, 15, 2024: Franchise Expo Austin, Austin, Texas.

Please note that the United States Attorney's Office per A.U.S.A. Samuel Raymond deferred to Pretrial regarding these requests.

Thank you for your consideration and continued courtesies to counsel.

Respectfully submitted,



Richard H. Rosenberg
Michael K. Bachrach

cc.: Pretrial Officer Abbott, A.U.S.A.s Felton and Raymond

Granted.
So ordered.
8/15/2024



J. PAUL OETKEN
United States District Judge